

JOY M. BIBLES McLEOD; May 18, 2010

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION

4 PATTY BEALL, MATTHEW MAXWELL,)
5 TALINA McELHANY and KELLY)
6 HAMPTON, individually and on)
7 behalf of all other similarly)
8 situated,) 2:08-cv-422 TJW
9)
10 Plaintiff(s),)
11)
12 vs.)
13)
14 TYLER TECHNOLOGIES, INC., and)
15 EDP ENTERPRISES, INC.,)
16)
17 Defendant(s).)

18 DEPOSITION UPON ORAL EXAMINATION OF
19 JOY M. BIBLES McLEOD

20 1:35 P.M.

21 MAY 18, 2010

22 520 PIKE STREET, 12TH FLOOR
23 SEATTLE, WASHINGTON

24
25 REPORTED BY: MARY L. GREEN, CCR 2981

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1 Q. And then you mentioned Darren Dundis.

2 A. Yes.

3 Q. What was his group?

4 A. His group worked with conversions if I recall,
5 and although I interfaced with some of those people, he
6 didn't train me. I didn't do anything with those
7 people.

8 Q. Do you recall anything from your interview
9 with him wherein you might have discussed the position
10 that you were taking in particular?

11 A. If there was a problem in conversion, his
12 group was the people that I contacted. That's what he
13 told me that they worked with conversions. If there's
14 a problem in a conversion, his group was the people
15 that were called.

16 Q. When you say conversion, as I understand it --
17 and tell me if I'm way off base -- they took the
18 customer or client's data and converted it from their
19 old system into the Tyler software.

20 A. That's correct.

21 Q. And you didn't work in that conversion group
22 itself?

23 A. No. But I still did have to deal with them
24 sometimes in that when there was a technical issue even
25 with the auxiliary modules, still their group were

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1 people that I sometimes had to deal with, because they
2 were technical support.

3 Q. So you went in and you interviewed with the
4 five different people that we have just mentioned. Did
5 you have any follow-up telephone or in-person
6 interviews with anyone at Tyler Technologies?

7 A. No, Ma'am.

8 Q. How did you --

9 A. Oh, Bruce Volkens was another person I met.

10 He was the VP.

11 Q. What do you recall from your discussion with
12 Mr. Volkens?

13 A. Another person telling me what a great place
14 it was to work, but very distant.

15 Q. What do you mean by distant?

16 A. He just -- he was -- he was executive
17 management, just very, very much -- it's a great place
18 to work, nice to meet you, you know, executive
19 management meeting a prospective employee and just
20 very, very, very friendly but got important things to
21 do. He didn't really give me any information. Very --

22 Q. Didn't spend much time with him?

23 A. Yeah. I mean, he met me more because
24 executive management, I think, needed to meet me, but
25 he didn't give me any information.

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1 Q. Can you tell me where that is?

2 A. It's implementation consultant continued.

3 Didn't participate in the user conference.

4 Q. I see. So where it says participate in the
5 annual user conference, you didn't actually --

6 A. I didn't do that. Where it says become
7 competent in other disciplines, generic business
8 process review, project management, web application
9 deployment, crystal report writer, didn't do that.

10 Q. Anything --

11 A. Achieving certification of multiple modules,
12 didn't do that. Pursue diversity that was not
13 technical specification, those weren't things that were
14 done. Prepare appropriate training materials as new
15 products are developed, didn't have anything to do with
16 writing training documentation. (Reviewing). So far
17 that's all I see that jumped out to me.

18 Q. And you've read through the entire document
19 that we've marked Deposition Exhibit 12, correct?

20 A. As fast as I can and process it with the time
21 that I had, yeah.

22 Q. We haven't tried to hurry you. We've given
23 you all the time you need.

24 A. (Reviewing).

25 MS. PERLIONI: Let the record reflect

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1 we're again sitting here as Ms. Bibles goes back
2 through the job description marked as Deposition
3 Exhibit 12.

4 A. I didn't work with the client to develop
5 procedures, documentation, and office systems to
6 facilitate software installation. I never did that.

7 Q. (BY MS. PERLIONI) Anything else?

8 A. (Reviewing). And I didn't document client
9 requirements.

10 MS. BAGLEY: Where is that?

11 THE WITNESS: Right here.

12 A. Thoroughly identify and document client
13 requirements to a level of detail required to design
14 configure, I didn't do that.

15 Q. (BY MS. PERLIONI) Anything else on Deposition
16 Exhibit 12?

17 A. If I see something, I'll let you know as we
18 go. I don't see anything now.

19 Q. I'd like to go back to what we marked
20 Deposition Exhibit 11. It's your declaration.

21 A. Okay.

22 Q. I'm looking specifically at paragraph 3.
23 "During the time I was an implementation consultant
24 with Tyler Technologies, Inc., my job duties consisted
25 primarily of walking clients through the implementation

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1 where I started.

2 Q. I think Ellen cleared that up, but I don't
3 think I was listening close enough.

4 A. I think I was unclear when I said that.

5 Q. When you would complete an implementation,
6 would you sometimes do follow-up telephone support with
7 those clients if they had questions?

8 A. No, Ma'am. I don't believe I did. I think
9 that when a client did call, because I was the face
10 that they knew, that our job was to pass them on to
11 support.

12 Q. Thank you. No further questions.

13 MS. PERLIONI: No redirect or recross.

14 (Deposition concluded at 4:37 p.m.)

15 (Signature was reserved.)

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1 CORRECTION & SIGNATURE PAGE

2 RE: BEALL v. TYLER TECHNOLOGIES;
3 USDC; 2:08-cv-422 TJW;
3 JOY M. BIBLES McLEOD

4 Reported By: Mary L. Green

5 I, JOY M. BIBLES McLEOD, have read the within transcript
6 taken May 18, 2010, and the same is true and accurate except
7 for any changes and/or corrections, if any, as follows:

8 PAGE/LINE	9 CORRECTION	10 REASON
11	12	13
14	15	16
17	18	19
20	21	22
23	24	25

21 Signed at _____, Washington, on this
22 date: _____.

24 JOY M. BIBLES McLEOD

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REPORTER'S CERTIFICATE

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3 I, MARY L. GREEN, the undersigned Certified Court
4 Reporter and Notary Public, do hereby certify:

5 That the sworn testimony and/or proceedings, a
6 transcript of which is attached, was given before me at the
7 time and place stated therein; that any and/or all witness(es)
8 were duly sworn to testify to the truth; that the sworn
9 testimony and/or proceedings were by me stenographically
10 recorded and transcribed under my supervision, to the best of
11 my ability; that the foregoing transcript contains a full,
12 true, and accurate record of all the sworn testimony and/or
13 proceedings given and occurring at the time and place stated
14 in the transcript; that I am in no way related to any party to
15 the matter, nor to any counsel, nor do I have any financial
16 interest in the event of the cause.

17 WITNESS MY HAND, SEAL, AND DIGITAL SIGNATURE this 23rd
18 day of May, 2010.

19

20

21 MARY L. GREEN
22 Certified Court Reporter, #2981
23 Notary Public in and for the State of Washington,
24 Residing in Snohomish County. Commission expires 4-4-2013.
25 mgreen@yomreporting.com

26 Click Link to Verify Signature:

27 ([Https://digitalid.verisign.com/services/client/index.html](https://digitalid.verisign.com/services/client/index.html))